Benjamin J. Otto (ISB No. 8292) 710 N 6th Street Boise, ID 83701 Ph: (208) 345-6933 x 12 Fax: (208) 344-0344 botto@idahoconservation.org

Attorney for the Idaho Conservation League

BEFORE THE IDAHO PUBLIC UTILITIES COMMISSION

IN THE MATTER OF THE APPLICATION OF ROCKY MOUTAIN POWER FOR AUTHORIZATION TO CHANGE DEPRECIATION RATES APPLICABLE TO ELECTRIC PROPERTY

CASE NO. PAC-E-18-08

PETITION TO INTERVENE OF THE IDAHO CONSERVATION LEAGUE

The Idaho Conservation League ("ICL") hereby petitions to intervene in the above captioned matter pursuant to the Idaho Public Utilities Commission Rules of Procedure, IDAPA 31.01.071-073. As discussed below, ICL has direct and substantial interests in these proceedings, and therefore should be granted intervention.

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1. The name of this intervenor is:

Benjamin J. Otto Idaho Conservation League 710 N. 6th st. Boise, Idaho 83702 Ph: (208) 345-6933 x 12 Fax: (208) 344-0344 botto@idahoconservation.org

Please provide copies of all pleadings, production requests, production responses, Commission orders, and other documents to the name and address above. In the interest of conserving natural resources and reducing the costs to all parties, please provide hard copies of pleadings, testimony, and briefs only. Production requests, responses, notices, Commission orders, and other filings may be submitted via electronic mail in accordance with IPUC Rules 31.01.01.063.02-03.

2. The Idaho Conservation League has a direct and substantial interest in this matter due to our longstanding engagement in Idaho electricity regulation and our approximately 20

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October 5, 2018

RECEIVED 2018 OCT 15 PM 1:11 IDAHO PUBLIC UTILITIES COMMISSION current, dues-paying members who are residential customers of Rocky Mountain Power. On behalf of our Rocky Mountain Power-served members, ICL claims a direct and substantial interest in this proceeding arising from the potential for book depreciation rates to impact future electric rates and resource planning. We bring a unique and valuable perspective to this proceeding due to our interest in aligning depreciation rates with the useful life of resources in order to ensure the inevitable transition away from legacy fossil fuels occurs in an orderly and economically justified manner. Because we will focus on the appropriate depreciation rates for certain assets identified in Rocky Mountain Power's Application, ICL's intervention will not unduly broaden the issues in this proceeding.

3. ICL intends to fully participate in this matter as a party. The nature and quality of ICL's intervention in the proceeding is dependant upon the nature and effect of other evidence in this proceeding. If necessary ICL may introduce evidence, be heard in argument, and call, examine, and cross-examine witnesses. ICL may seek intervenor funding pursuant to IDAPA 31.01.01.161-165.

WHEREFORE, ICL respectfully requests the Commission grant this petition. DATED this 5th day of October 2018.

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Respectfully submitted,

Benjamin J. Otto Idaho Conservation League

CERTIFICATE OF SERVICE

I certify that on the 5th day of October, 2018, I delivered true and correct copies of the foregoing PETITION TO INTERVENE to the following via the service method noted:

Hand delivery:

in to

Benjamin J. Otto Idaho Conservation League

Diane Hanian Commission Secretary (Original and 7 copies) Idaho Public Utilities Commission 427 W. Washington St. Boise, ID 83702-5983

Electronic Mail only: Rocky Mountain Power Yvonne R. Hogle Ted Weston Rocky Mountain Power 1407 West North Temple, Suite 320 Salt Lake City, Utah 84116 yvonne.hogle@pacificorp.com ted.weston@pacificorp.com datarequest@pacificorp.com

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